

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KINSALE INSURANCE COMPANY, a
foreign insurer,

Plaintiff,

v.

EAGLE COUNTRY CONSTRUCTION,
INC., a Washington Corporation; MICHAEL
J. HANSEN and ROCHELLE HANSEN,
individually and the marital community
comprised thereof; INNOVATIVE
INVESTMENTS, INC., a Washington
corporation; COLTON and MORGAN
PATTERSON, a married couple; DUSTIN
KRENZ and RACHEL STOKES, an
unmarried couple; WILLIAM and
KIMBERLY UNRAU, a married couple;
ALEX and LINDSAY CRAIG, a married
couple; GRETA and ANTHONY
CHEHREHGOSHA, a married couple;

Defendants.

No. 2:22-cv-664- RSL

**JOINT MOTION AND ORDER FOR
EXTENSION OF TIME FOR KINSALE
INSURANCE COMPANY TO
ANSWER EAGLE COUNTRY AND
CONSTRUCTION, INC.'S AND
INNOVATIVE INVESTMENTS, INC.'S
COUNTERCLAIMS**

Plaintiff/Counterclaim Defendant Kinsale Insurance Company (hereinafter “Kinsale”) and
Defendants/Counterclaim Plaintiffs Eagle Country Construction Inc., and Innovative Investments,
Inc., (collectively “Counterclaimants”) submit the following Joint Motion for Extension of Time
for Kinsale to Answer or otherwise respond to the Counterclaimants’ Counterclaims.

JOINT MOTION AND ORDER FOR
EXTENSION TIME FOR KINSALE TO
ANSWER EAGLE COUNTRY AND INNOVATIVE’S
COUNTERCLAIMS – 1
CAUSE NO. 22-cv-664 RSL

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The above-referenced parties specifically request that the Court extend the time for Kinsale to file their Answer or other response to the Counterclaimants' Counterclaims to August 23, 2022.

I. BREIF STATEMENT OF FACTS

The current deadline for Kinsale to file their Answer or respond is on August 16, 2022, today. Kinsale is finalizing its Answer to the Counterclaims. Accordingly, the above-referenced parties have agreed that the deadline for Kinsale to file their Answer or other response to the Counterclaims should be extended to August 23, 2022. The above parties agree that this Joint Motion should not affect any other case deadlines.

II. MEMORANDUM OF LAW

Federal Rule of Civil Procedure 6(b)(1)(A) states, in pertinent part, as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time:... (A) with or without motion or if the court acts, or if a request is made, before the original time or its extension expires...

Fed. R. Civ. P. 6(b)(1)(A)

The Court has the discretion and authority to grant and extension of time for the filing of pleadings for good cause. *See PLU Investments, LLC v. Intraspect Group Inc.*, 2011 U.S. Dist. LEXIS 42020, 2011 WL 1376192 (W.D. Wash. Apr. 12, 2011) (citing *In re Veritas Software Corp. sec. Litig.*, 496 F.3d 962, 974(9th Cir. 2007)). A motion for extension of time filed before a deadline has passed should "normally... be granted in the absence of bad faith on the part of the party seeking relief or prejudice to the adverse party." *Id.* (citing *Ahanchian v. Zenon pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010)).

Kinsale has requested that Moving Defendants provide additional time for them to prepare their Answers or otherwise respond to the Counterclaimants' Counterclaims. Kinsale is finalizing its Answer or other response to Counterclaimants' Counterclaims. Moving Defendants agree to

1 the requested extension. As a result, there is good cause for this Court to grant the extension and
2 this joint request in good faith.

3 Accordingly, the above parties request that the Court grant this Joint Motion for Extension
4 of Time and allow Kinsale until August 23, 2022, to file an Answer to Moving Defendants'
5 Complaint and to further allow all responsive pleadings to be filed in accordance with the Federal
6 Rules. No other case scheduling dates shall be affected by this Joint Motion.

7 DATED this 16th day of August 2022.

8 LETHER LAW GROUP

9 /s/ Eric J. Neal

10 Thomas Lether, WSBA#18089

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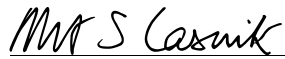
14 *Attorneys for Plaintiff*

**ORDER GRANTING JOINT MOTION
FOR EXTENSION OF TIME FOR ANSWER TO COMPLAINT**

The Court, having considered the Joint Motion for Extension of Time for Kinsale to Answer to the Counterclaimants' Counterclaims, hereby ORDERS as follows:

1. The Joint Motion for Extension of Time for Answer or otherwise respond to the Counterclaims is hereby GRANTED.
2. The deadline for Kinsale to file their Answers or other response to the Counterclaimants' Counterclaims is extended to August 23, 2022.
3. This Order does not affect any other deadlines in this case.

Dated this 17th day of August, 2022.



Robert S. Lasnik
United States District Judge